

B O I E S , S C H I L L E R & F L E X N E R L L P

333 MAIN STREET\* ARMONK, NEW YORK 10504\* 914-749-8200\* FAX 914-749-8300

March 11, 2015

**Via ECF**

Honorable Denise Cote  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 1610  
New York, NY 10007-1312

**Re:    *The Bank of New York Mellon, solely as Trustee for GE-WMC  
Mortgage Securities Trust 2006-1 v. WMC Mortgage, LLC and  
GE Mortgage Holding, L.L.C. 12-CV-7096 (DLC)***

Dear Judge Cote:

We represent The Bank of New York Mellon, as Trustee for GE-WMC Mortgage Securities Trust 2006-1 ("Trustee"). Pursuant to Rule 4(A) of Your Honor's Individual Practices in Civil Cases and Your Honor's instructions at the February 27, 2015 conference, we write to request the sealing of one document the Trustee submitted with its Memorandum of Law in Opposition to WMC's Assertion of Attorney-Client Privilege and Work Product Privilege as to Categories W4 and W5 on WMC's Privilege Log, which the Trustee served on March 5, 2015. Specifically, the Trustee requests that the Court permit the Trustee to file under seal Fruchter Exhibit D, which contains non-public borrower information and the names of third-party investors to various transactions. The sealing of Fruchter Exhibit D is consistent with this Court's prior orders permitting the sealing of similar documents in relation to the parties' pending motions for partial summary judgment.

Defendants WMC Mortgage, LLC and GE Mortgage Holding, L.L.C., do not join or oppose this request.

The Trustee will provide the Court with hard copies of this letter and Fruchter Exhibit D forthwith, and will promptly publicly file its complete papers consistent with any order issued by this Court regarding this request.

Respectfully,  
/s/ Motty Shulman  
Motty Shulman

cc:     Counsel of Record (via ECF)